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## UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

## **EASTERN DIVISION**

LISA CORSON,

Plaintiff,

v.

GREATER PALM SPRINGS
TOURISM FOUNDATION dba
GREATER PALM SPRINGS
CONVENTION AND VISITORS
BUREAU,

Defendant.

DECLARATION OF MATTHEW L. ROLLLIN IN SUPPORT OF

Case No.: 5:22-cv-00736-JWH-PVC

APPLICATION FOR ENTRY OF CLERK'S DEFAULT

I, Matthew L. Rolllin, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff LISA CORSON ("Corson") in the above-captioned matter. I make this Declaration, which is filed in support of Corson's Motion for Entry of Clerk's Default, and I could and would testify competently to the matters set forth herein.

- 2. On April 28, 2022, Corson filed her Complaint against Defendant Greater Palm Springs Tourism Foundation dba Greater Palm Springs Convention and Visitors Bureau ("GPSCVB") (ECF 1).
- 3. On May 2, 2022, GPSCVB was served with the Summons and the Complaint by Substitute Service, by serving Jasmine "Doe", front desk/person-incharge, a person apparently in charge thereof, at GPSCVB's Registered Agent, Ms. Lena Wade, 1800 East Tahquitz Canyon Way, Palm Springs, California, 92262. A copy of the Summons and Complaint was then mailed via First Class Mail, postage fully pre-paid on May 2, 2022 addressed to GPSCVB's Registered Agent, Ms. Lena Wade, 1800 East Tahquitz Canyon Way, Palm Springs, California, 92262. Attached hereto as Exhibit "A" is a true and correct copy of the Affidavit of Service on file with the Court, reflecting that GPSCVB was served by substitute service with the Summons and a copy of the Complaint.
  - 4. The time allowed for GPSCVB to respond to the Complaint has expired.
- 5. GPSCVB has not been granted an extension of time to respond to the Complaint.
- 6. GPSCVB has failed to answer or otherwise respond to the Complaint, or serve a copy of its Answer or other response upon Corson's attorneys of record.
- 7. I am informed and do not believe that GPSCVB is an infant or incompetent person, and, upon information and belief, the Servicemembers Civil Relief Act does not apply.

I declare under perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 6, 2022

<u>/s/ Matthew L. Rollin</u> MATTHEW L. ROLLLIN